

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOHN P. "JACK" FLYNN  
LESLIE A. FLYNN,

Plaintiffs,

- against -

CABLE NEWS NETWORK, INC.,

Defendant.

Case: 1:21-cv-02587-AS-SLC

**NOTICE OF MOTION FOR  
ATTORNEYS' FEES AND COSTS**

**ORAL ARGUMENT REQUESTED**

**PLEASE TAKE NOTICE** that Defendant Cable News Network, Inc. will move this Court, before the Honorable Arun Subramanian, United States District Judge, Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on such date and time as the Court sets for an order for reasonable attorneys' fees and costs pursuant to the fee-shifting provision in Rhode Island's invasion of privacy statute, R.I. Gen. Laws § 9-1-28.1(b), and Federal Rules of Civil Procedure Rule 54(d)(2), and for such other and further relief as the Court shall deem just and proper. In support of this motion, Defendant relies upon the accompanying (1) Memorandum of Law in Support of Defendant's Motion for Attorneys' Fees and Costs, and (2) Declaration of Katherine M. Bolger and the exhibits annexed thereto.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b), opposing papers, if any, shall be served upon the undersigned within fourteen days from the date that the motion for attorneys' fees and costs is filed or served, *i.e.*, by May 28, 2024; and reply papers, if any, must be served within seven days of the answering papers, *i.e.*, by June 4, 2024.

Dated: New York, New York  
May 14, 2024

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

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